

SHER TREMONTÉ LLP

January 6, 2022

BY ECF

Hon. Alison J. Nathan
United States District Court Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2102
New York, New York 10007

Re: *Phoenix Inter Co. Ltd. v. Just Goods Inc.*,
Case No. 1:21-cv-10761 (AJN) (OTW)

Dear Judge Nathan:

This firm has been engaged to represent Defendant, Just Goods, Inc., in the above-referenced action. Pursuant to Paragraphs 1(D) and 1(E) of Your Honor's Individual Practices in Civil Cases, I write to seek an adjournment of the deadline to respond to the Complaint. The current deadline for Defendant to file an answer or responsive pleading is January 10, 2022.

I respectfully request that Defendant's deadline to answer or otherwise respond to the Complaint be adjourned by thirty days, from January 10, 2022 to February 9, 2022. There have been no previous requests to adjourn this deadline. On December 30, 2021, I conferred with counsel for Plaintiff concerning this request, but to date, Plaintiff's counsel has been unable to obtain confirmation of Plaintiff's position with respect to the requested extension.

Thank you very much for your consideration.

Respectfully submitted,

/s/ Erica A. Wolff

Erica A. Wolff

cc: All counsel of Record (by ECF)